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Amended Complaint

Plaintiff: Samuel

Defendant: Barnard College

Case No.: 1:23-cv-06181-LTS

Judge: Laura Taylor Swain

Court: United States District Court for the Southern District of New York

Causes of Action:

- Retaliation Under Title IX
- Violation of Equal Protection Clause of the Fourteenth Amendment

Introduction

I am a male screenwriter who was denied admission to a screenwriting workshop at Barnard College in retaliation for my advocacy for gender equality. Barnard College is a private women's college in New York City that is affiliated with Columbia University.

Background

In 2023, I filed a complaint with the Office for Civil Rights (OCR) alleging that Barnard College's Athena Film Festival and Athena Center violated Title IX and Title VI by discriminating against men. The OCR found that Barnard College had violated Title IX and Title VI, and Barnard College subsequently opened those programs to all races, both sexes, and all sexual orientations.

After the OCR's finding, I applied to the Barnard College screenwriting workshop. He was rejected, but he believes that he was rejected in retaliation for his advocacy for gender equality.

Claims

Retaliation Under Title IX

Title IX of the Education Amendments of 1972 prohibits educational institutions from retaliating against individuals who file complaints of sex discrimination. Samuel alleges that Barnard College retaliated against him for filing a complaint with the OCR by rejecting his application to the screenwriting workshop. OCR is currently investigating Barnard College for this act of retaliation.

Violation of Equal Protection Clause of the Fourteenth Amendment

The Equal Protection Clause of the Fourteenth Amendment prohibits the government and government funded or from denying individuals equal protection under the laws. Barnard College's policy of excluding men from its undergraduate admissions program violates the Equal Protection Clause.

New York Human Rights Law

Sec discrimination, as well as gender identity and sexual orientation discrimination are illegal under the New York Human Rights Law.

Relief

I seek the following relief:

- A declaration that Barnard College violated Title IX and the Equal Protection Clause by retaliating against me for filing a complaint with the OCR and by excluding men from its undergraduate admissions program.
- An injunction prohibiting Barnard College from retaliating against individuals who file complaints of sex discrimination and from excluding men from its undergraduate admissions program.
- An award of damages for the emotional distress and lost opportunities he has suffered as a result of Barnard College's discriminatory conduct.

Conclusion

I respectfully requests that the Court grant me the relief requested in this Complaint.

Signature of Plaintiff

A handwritten signature in black ink, appearing to read "Dustin Gm", written in a cursive style.